



Minnesota Department of Transportation

395 John Ireland Boulevard
Saint Paul, MN 55155

Date: 21 February 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Room TW-B204
Washington, DC 20554

RE: IB Docket No. 11-109

To Whom It May Concern:

The Minnesota Department of Transportation (MnDOT) urges vacation of the Conditional Waiver granted LightSquared LLC. Lacking successful cost effective mitigation strategies, implementation of LightSquared's planned terrestrial operations will have severe negative impacts upon MnDOT. These impacts are not limited to budgetary considerations, but will prolong timelines for delivery of projects as well as extend to MnDOT's ability to promote safety and protect the environment. MnDOT's partners, both in the public and private sector, will share many of these same negative consequences.

Loss of precision GPS capability will require MnDOT to revert to older, more labor intensive methods of conducting surveys for design, right-of-way, and construction purposes. The increased costs of additional personnel and longer delivery times, added to the lost money invested in what may become useless equipment, will do little to allay public concerns and perceptions about the inefficiency of government. Though not in the public eye to the same extent as government, the same cost and time considerations apply to the private contracting community; not just those working on MnDOT projects but also those working on local government and private projects.

Precision GPS, the user segment most susceptible to interference from LightSquared's proposed terrestrial operations, is required for Intelligent Vehicle Systems such as those used to guide snowplows through whiteout conditions or to keep a nine-foot wide bus operating on a ten-foot wide shoulder. Loss of this capability will result in increased traffic congestion and decreased safety for the public.

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MnDOT operates a statewide network of Precision GPS receivers that are used not only by the Department and our contractors, but by local government, the private sector surveying community, and the agriculture community. These users are realizing not only cost savings and productivity benefits, but also a reduced impact on the environment. Air pollution from poorly utilized equipment is reduced, as is water pollution from over fertilization. Were these systems to be lost, the natural environment would suffer along with the economic environment.

For these reasons, MnDOT urges vacation of LightSquared's Conditional Waiver for terrestrial operations until it can be successfully demonstrated that such operations will not negatively impact the precision GPS segment of the communications spectrum. If you desire further information, please contact:

Rick Morey
Assistant Director, Surveying and Mapping
Office of Land Management
Mail Stop 630
395 John Ireland Blvd.
St. Paul, MN 55155
Ph: 651-366-3504
E-mail: richard.morey@state.mn.us

Thank you for your consideration and support in this matter.

Sincerely,



Thomas K. Sorel
Commissioner

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